

SHEPPARD MULLIN RICHTER & HAMPTON, LLP

Edward H. Tillinghast, III, Esq. (ET 5566)
Carren B. Shulman, Esq. (CS 2804)
Byoung Soo Kim, Esq. (BK 5363)
Roger M. Zaitzeff, Esq. (RMZ 1950)
Malani J. Cademartori, Esq. (MS 3882)²
Blanka K. Wolfe, Esq. (BW 0925)
30 Rockefeller Plaza, 24th floor
New York, New York 10112
Telephone: (212) 332-3800
Facsimile: (212) 332-3888

Counsel for Hankook Tire Co., Ltd., Hankook Tire America Corporation, MSC Mediterranean Shipping Company S.A., Exel Inc., Exel Transportation Services, Inc., Air Express International USA, Inc. (d/b/a DHL Global Forwarding), and Synopsys, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

GENERAL MOTORS CORP., *et al.*,
Debtors.

Case No. 09-50026 (REG)
Chapter 11
Jointly Administered

**VERIFIED STATEMENT OF SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
PURSUANT TO BANKRUPTCY RULE 2019**

SHEPPARD, MULLIN, RICHTER & HAMPTON, LLP ("Sheppard Mullin") submits this verified statement pursuant to Rule 2019(a) of the Federal Rules of Bankruptcy Procedure (the "Verified Statement") in connection with the above-captioned chapter 11 cases of General Motors Corp., *et al.* (collectively, the "Debtors"), and states as follows:

1. Sheppard Mullin currently represents the following parties in interest and creditors identified below that hold claims against and/or interests in the Debtors arising out of applicable agreements, law or equity pursuant to their respective relationships with the Debtors in these bankruptcy cases (the "Entities"):

- (i) Hankook Tire Co., Ltd.
647-15 Yeoksam-dong, Gangnam-gu,
Seoul 135-723 Korea
- (ii) Hankook Tire America Corporation
1450 Valley Road
Wayne, NJ 07470
- (iii) MSC Mediterranean Shipping Company S.A.
40 Avenue Eugène Pittard
1206 Geneva
Switzerland
- (iv) Air Express International USA, Inc. (d/b/a DHL Global Forwarding)
1200 South Pine Island Road, Suite 140-145
Plantation, FL 33324
- (v) Exel Transportation Services, Inc.
17330 Preston Road, Suite 200 C
Dallas, TX 75252-6035
- (vi) Exel Inc.
570 Polaris Parkway
Westerville, Ohio 43082
- (vii) Synopsys, Inc.
700 East Middlefield Road
Mountain View, CA 94043

2. Each of the Entities separately requested that Sheppard Mullin represent them and their individual interests in connection with the Debtors' chapter 11 cases.

3. Each of these representations are separate representations, except that (a) Exel Inc., Exel Transportation Services, Inc. and Air Express International USA, Inc. (d/b/a DHL Global Forwarding) are affiliates of one another and may file combined papers, as appropriate, and (b) Hankook Tire Co., Ltd. and Hankook Tire America Corporation are affiliates of one another and may file combined papers, as appropriate. They are not under, or in connection with, any of Sheppard Mullin's clients acting together pursuant to a deposit agreement, proxy or committee arrangement. Information about the claims and interests held by Sheppard Mullin's

clients are to be filed in their respective proofs of claim, administrative claims, statements of interest, or other pleadings filed in the Debtors' chapter 11 cases.

4. Sheppard Mullin may also represent these or other clients in matters pertaining to the Debtors outside of these bankruptcy cases and otherwise, and in the future it may undertake other engagements. Those representations may or may not result in other representations in these bankruptcy cases. If such representations come to involve representations in these bankruptcy cases, this Verified Statement will be supplemented.

5. Upon information and belief, Sheppard Mullin does not currently possess any claims against or interests in any Debtor.¹

6. The undersigned verifies under oath that this Verified Statement is true and accurate to the best of the undersigned's knowledge and belief.

¹ Members and associates of Sheppard Mullin, in their individual capacities, may hold claims and/or equity interests in Debtors.

Dated: June 19, 2009
New York, New York

SHEPPARD MULLIN RICHTER & HAMPTON, LLP

By: /s/ Blanka K. Wolfe

Blanka K. Wolfe (BW 0925)
Edward H. Tillinghast, III (ET 5566)
Carren B. Shulman (CS 2804)
Byoung Soo Kim (BK 5363)
Roger M. Zaitzeff (RMZ 1950)
Malani J. Cademartori (MS 3882)²
30 Rockefeller Plaza, 24th floor
New York, New York 10112
Telephone: (212) 332-3800
Facsimile: (212) 332-3888

Counsel for Hankook Tire Co., Ltd., Hankook Tire America Corporation, MSC Mediterranean Shipping Company S.A., Exel Inc., Exel Transportation Services, Inc., Air Express International USA, Inc. (d/b/a DHL Global Forwarding), and Synopsys, Inc.

² Attorney is in the process of having legal name change recorded with all applicable government and judicial entities.

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2009, I caused a copy of the foregoing to be sent by first-class mail, postage prepaid, to the parties listed below, and by automatic ECF notice to those parties receiving ECF in the above-captioned case:

By: /s/ Blanka K. Wolfe
Blanka K. Wolfe.

Weil, Gotshal & Manges LLP
Attn: Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
767 Fifth Avenue
New York, NY 10153

Honigman Miller Schwartz and Cohn LLP
Attn: Joseph R. Sgroi
Robert B. Weiss
Tricia A. Sherick
2290 First National Building
660 Woodward Avenue
Detroit, MI 48226

United States Trustee
Attn: Andrew D. Velez-Rivera
Brian Shoichi Masumoto
Diana G. Adams
33 Whitehall Street
21st Floor
New York, NY 10004

Kramer Levin Naftalis & Frankel LLP
Attn: Gordon Z. Novod
1177 Avenue of the Americas
New York, NY 10036